

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO:
*United States of America ex rel. Ven-A-Care of
the Florida Keys, Inc. v. Boehringer Ingelheim
Corporation, et al.*, Civil Action No. 07-
10248-PBS

MDL 1456

Master File No. 01-CV-12257-PBS
Subcategory Case No. 06-11337-PBS

Judge Patti B. Saris

Magistrate Judge Marianne B. Bowler

AFFIDAVIT OF MARTIN L. ROTH

I, Martin L. Roth, depose and state as follows:

1. I am an attorney at law licensed to practice in the Commonwealth of Massachusetts and the State of Illinois. I was admitted to the Massachusetts Bar in January 2008. I was admitted to the Illinois Bar in November 2008. I am also admitted to practice in the United States Court of Appeals for the Seventh Circuit.

2. I am a resident of Illinois and have been a practicing attorney for two years.

3. I am currently an attorney in the law firm of Kirkland & Ellis LLP.

4. I am a member in good standing of the Massachusetts Bar and am duly licensed and admitted to practice law by the Commonwealth of Massachusetts. My Massachusetts attorney identification number is 669396.

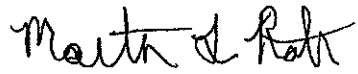
5. I am a member in good standing of the Illinois Bar and am duly licensed and admitted to practice law by the State of Illinois. My Illinois attorney identification number is 6296464.

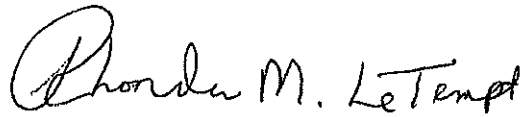
6. I have never been suspended or disbarred in any jurisdiction and there are no disciplinary actions pending against me.

7. My clients, Defendants Boehringer Ingelheim Corporation; Boehringer Ingelheim Pharmaceuticals, Inc.; Roxane Laboratories, Inc.; and Roxane Laboratories, Inc. n/k/a Boehringer Ingelheim Roxane, Inc. (collectively the "Boehringer Defendants"), in the above-captioned action, have requested that I represent their interests in this matter. The Boehringer Defendants have been my clients since September 2008, and I have been actively involved in representing the Boehringer Defendants' interests since that time.

8. If the Court allows the Motion for me to appear *pro hac vice* in this matter, I will continue to represent the Boehringer Defendants in this proceeding until the final determination thereof, and with reference to all matters, incidents, or proceedings, I agree that I shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court in all respects as if I were regularly admitted.

Signed under the penalties of perjury this 24th day of September, 2009.


Martin L. Roth


September 24, 2009

